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August 14, 2023

**Via ECF**

**MEMORANDUM ENDORSED**

Hon. Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Espinal et al. v. Sephora USA, Inc., Case No. 1:22-cv-03034-PAE-GWG

Dear Judge Gorenstein:

I represent Plaintiffs in the above-captioned action and I write in accordance with Rule I.E of Your Honor's Individual Practices. With the consent of counsel for Defendant, I write to request an extension of the fact discovery deadline and class certification deadline set forth in the Court's January 1, 2023 Scheduling Order (ECF No. 38).

There have been no previous requests to extend these deadlines. The reason for the requested extension is because, as stated in the parties' August 2, 2023 Letter (ECF No. 49), the parties are in the process of negotiating a discovery stipulation to cover the production of names and contact information for a sampling of putative class members to be used in connection with Plaintiffs' forthcoming motion for class certification. Given these ongoing negotiations, additional time is necessary to finalize and effectuate the class member sampling and complete deposition discovery. Counsel for Defendant consents to this request, and the requested extension will not affect any other deadlines. Accordingly, Plaintiffs' respectfully request an extension as set forth below:

Event	Current Deadline	Proposed New Deadline
Completion of all discovery other than expert discovery	September 1, 2023	March 1, 2024
Deadline to file motion for class certification	September 1, 2023	March 1, 2024

Thank you for your consideration to this matter.

Respectfully,


A handwritten signature in blue ink that reads "Y. Kopel".

CC: All counsel of record via ECF

Yitzchak Kopel

The proposed schedule is approved.

So Ordered.

A handwritten signature in black ink that reads "Gabriel W. Gorenstein".  
\_\_\_\_\_  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge

August 14, 2023